

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

SHIRLEY CAMBREL
12744 Hillmeade Station Drive
Bowie, MD 20727

Plaintiff,

vs.

CAL No. CALIS-00490

WASHINGTON METROPOLITAN
AREA TRANSIT AUTHORITY
Attn: Susan Serrian,
General Counsel
600 Fifth Street, N.W.
Washington, D.C. 20001

Defendant.

COMPLAINT

COUNT I
(Negligence)

Clerk of the
Circuit Court
2015 JAN 23 AM 10:09
PR GEO CO MD # 99

The plaintiff Shirley Cambrel, by and through counsel, sues the defendant Washington Metropolitan Area Transit Authority, and for her cause of action states as follows:

1. On or about October 30, 2013, at approximately 6:00 p.m., a Metrobus owned by defendant Washington Metropolitan Area Transit Authority (hereinafter referred to as "WMATA"), and negligently operated by its employee, agent and/or servant, within the scope of the employment, agency, and/or master/servant relationship, collided with a motor vehicle owned and operated, in the absence of any and all negligence, by plaintiff Shirley Cambrel. At the time of the collision, plaintiff's vehicle was at a stop for a red light on Ellin Road, at or near the intersection with Route 410 in (Hyattsville/New Carrollton/Lanover Hills) in Prince George's County, Maryland.

2. The collision would not have occurred but for the fact that defendant WMATA's employee negligently operated his motor vehicle in a careless and reckless manner, negligently failed to keep a proper lookout, negligently failed to pay full time and

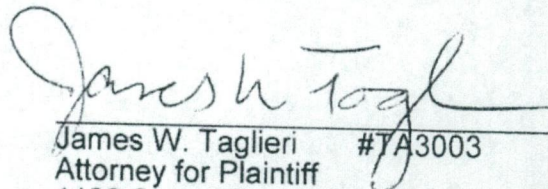
-2-

attention to the operation of his motor vehicle, negligently followed too closely, negligently operated his vehicle at an unreasonable speed, negligently failed to slow for the traffic ahead of him, negligently failed to keep his motor vehicle from colliding with other motor vehicles on the roadway, negligently failed to maintain its lane of travel, and negligently disregarded the traffic regulations of the District of Columbia then and there in full force and effect.

3. As a direct and proximate result of the aforesaid negligence, plaintiff Shirley Cambrel sustained injury to all parts of her body, some of which are believed to be permanent, especially to her neck, low back, right knee, and right arm, suffered and shall suffer great pain of body and mind, incurred and shall incur medical and out-of-pocket expenses, lost and shall lose time and wages from her employment, suffered damage to his motor vehicle and has lost the use thereof, and, as a result, has been damaged in an amount in excess of \$75,000.00.

WHEREFORE, the premises considered, plaintiff Shirley Cambrel demands judgment against the defendant Washington Metropolitan Area Transit Authority, in in an amount in excess of \$75,000.00.

CADEAUX, TAGLIERI & NOTARIUS, P.C.

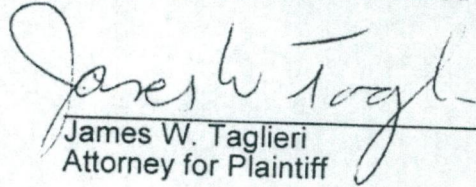


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-3-

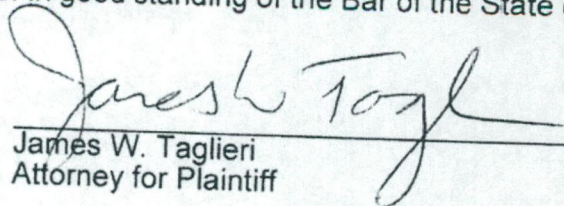
JURY DEMAND

Plaintiff demands a trial by a jury as to all issues involved herein.


James W. Taglieri
Attorney for Plaintiff

CERTIFICATE

I certify that I am a member in good standing of the Bar of the State of Maryland.


James W. Taglieri
Attorney for Plaintiff

JWT/fan